

# Exhibit A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:* *Federal Insurance Co., et al v. al Qaida, et al.*  
03 CV 06978 (RCC)

**AFFIDAVIT OF SERVICE**

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN  
DISTRICT OF NEW YORK:

J. Scott Tarbutton, Esquire, hereby states that Plaintiffs' First Amended Complaint, Summons, Notice of Suit, and translations of each, filed in the above-captioned matter were served upon defendants, the Islamic Republic of Iran, the Republic of Sudan, and the Syrian Arab Republic.

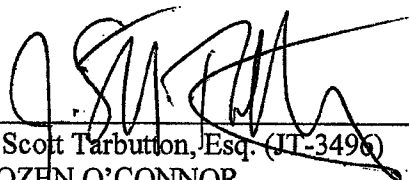
Service was effectuated upon the Iranian Ministry of Foreign Affairs, as transmitted by the Foreign Interests Section of the Embassy of Switzerland in Teheran, on December 7, 2004, in accordance with the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608 *et seq.* True and correct copies of the Return of Service and supporting U.S. Department of State documents are attached hereto as Exhibit A.

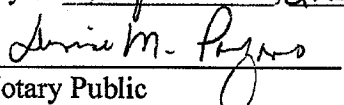
Service was effectuated upon the Sudanese Ministry of Foreign Affairs, as transmitted by the American Embassy in Khartoum, Sudan, on November 30, 2004, in accordance with the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608 *et seq.* True and correct copies of the Return of Service and supporting U.S. Department of State documents are attached hereto as Exhibit B.

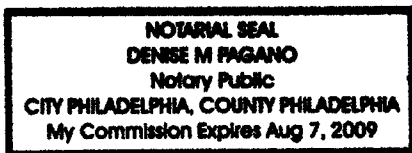
Service was effectuated upon the Syrian Ministry of Foreign Affairs by J. Michael McMahon, Clerk of the Court of the Southern District of New York, by registered mailing on June 4, 2004 (#RB 632 958 829), return receipt requested, pursuant to the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608 *et seq*, and which was received and accepted by the Syrian Ministry of Foreign Affairs on June 15, 2004. True and correct copies of the Certificate of Mailing and Return Receipt for International Mail are attached hereto as Exhibit C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained herein is true and correct.

Dated: Philadelphia, Pennsylvania  
September 8, 2005

  
J. Scott Tarbutton, Esq. (JT-3496)  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103  
Tel: (215) 665-2000

Sworn to before me this 8th  
day of Sept., 2005.  
  
Notary Public



PHILA\2331283\1 117430.000

# **EXHIBIT A**



**United States Department of State**

**Washington, D.C. 20520**

January 13, 2005

Mr. Joseph LaMura  
Chief Deputy Clerk  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

re: **Federal Insurance Company, et al. v.  
al-Qaida, et al., Case Number 03-CV-6978 (RCC)**

Dear Mr. LaMura:

I am writing regarding the Court's request for service of a summons, complaint and notice of suit pursuant to 28 U.S.C. 1608(a)(4) upon defendant the Islamic Republic of Iran in the above mentioned lawsuit. Because the United States does not maintain diplomatic relations with the government of Iran, the Department of State is assisted by the Foreign Interests Section of the Embassy of Switzerland in Teheran in delivering these documents to the Iranian Ministry of Foreign Affairs.

The documents were delivered to the Iranian Ministry of Foreign Affairs under cover of diplomatic note number 1050-IE dated December 7, 2004. While service under 28 U.S.C. 1608(a)(4) is effective upon delivery of the diplomatic note, the documents were subsequently returned to the Foreign Interests Section of the Swiss Embassy in Teheran.

In accordance with the procedures established for the implementation of the Foreign Sovereign Immunities Act, enclosed are two copies of the summons, complaint and notice of suit, one as proof of service and one returned to the Swiss Embassy, along with certified copies of the diplomatic notes used to transmit them.

Should you have any questions regarding this matter, please do not hesitate to contact me at (202) 736-9115.

Sincerely,

A handwritten signature in dark ink, appearing to read "William P. Fritzen", written over a horizontal line.

William P. Fritzen

Attorney Adviser

Office of Policy Review and Interagency Liaison

Enclosures As Stated



Embassy of the United States of America  
November 22, 2004

CONS NO. 14537

U R G E N T !

Federal Department of Foreign  
Affairs  
Foreign Interests Service  
Bundesgasse 32  
3003 Bern

Subject: JUDICIAL ASSISTANCE: Summons, Complaint and Notice  
of Suit Pursuant to the Foreign Sovereign Immunities Act -  
Federal Insurance Company, et al. v. al-Qaida, et al., Case  
No. 03-CV-6978 (RCC) (SDNY)

REF: ----

The Department of State has requested the delivery of the  
enclosed Summons, Complaint and Notice of Suite to the  
Islamic Republic of Iran pursuant to the Foreign Sovereign  
Immunities Act in the matter of Federal Insurance Company, et  
al. v. al-Qaida, et al.; Case No. 03-CV-6978 (ROC) (SDNY).

The Embassy is herewith requesting the Swiss Ministry of  
Foreign Affairs to transmit the documents to the American  
Interests Section of the Swiss Embassy in Tehran. The  
American Interests Section should transmit the Summons,  
Complaint and Notice of Suite to the Islamic Republic of Iran  
under cover of a diplomatic note utilizing the language  
provided in the enclosed instruction.

Transmittal should be done in a manner which enables the  
Embassy to confirm delivery. The American Interests Section  
should execute the certification of the diplomatic note,  
which will be forwarded by the Department of State to the  
requesting court in the United States.

Enclosed is the appropriate part of a message the Embassy  
received from the Department of State as well as two sets of  
the Summons, Complaint and Notice of Suit for the Islamic  
Republic of Iran.

The Embassy would appreciate being informed of the date the American Interests Section of the Swiss Embassy in Tehran receives the documents as well as the date the Interests Section forwards the Summons, Complaint and Notice of Suit to the Iranian authorities.

SPP's speedy assistance is much appreciated.



SPECIFIC AUTHENTICATION CERTIFICATE

Confederation of Switzerland )  
Bern, Canton of Bern ) SS:  
Embassy of the United States of America )

I certify that the annexed document bears the genuine seal of the Swiss Federal Department of Foreign Affairs.

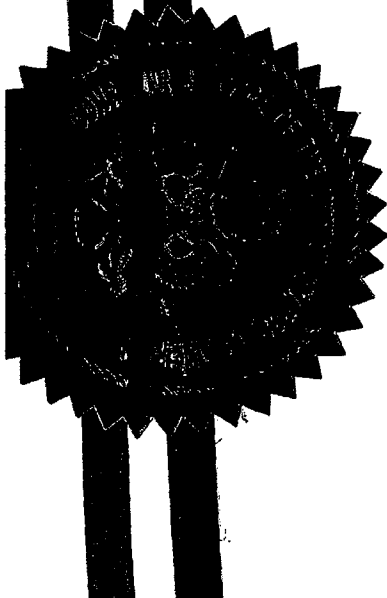
I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

  
(Signature of Consular Officer)

Christopher K. Derrick  
(Typed name of Consular Officer)

Vice Consul of the United States of America  
(Title of Consular Officer)

December 27, 2004  
(Date)





**22404****EIDGENÖSSISCHES DEPARTEMENT  
FÜR AUSWÄRTIGE ANGELEGENHEITEN****DRINGEND**  
**K.252.41 USA/IRAN 3**

Das Eidgenössische Departement für auswärtige Angelegenheiten, bezieht sich auf die Note CONS No. 14537 vom 22. November 2004 sowie seine Note Nr. 22378 vom 13. Dezember 2004 betr. die Übermittlung von Gerichtsakten an das "Ministry of Foreign Affairs of the Islamic Republic of Iran to the lawsuit Federal Insurance Company, et al. v. al-Qaida, et al. which is pending in the U.S. Federal District Court for the Southern District of New York, case No. 03-CV-6978 (RCC)." Das Departement beehrt sich, der Botschaft der Vereinigten Staaten von Amerika, in der Botschaft den ersten und zweiten Satz der Unterlagen zuzustellen, die es vom Dienst für amerikanische Interessen der Schweizerischen Botschaft in Teheran zurückerhalten hat.

- **2 Sätze Gerichtsakten JUDICIAL ASSISTANCE: Summons, Complaint and Notice of Suit Pursuant to the Foreign Sovereign Immunities Act – Federal Insurance Company, et al. v. al-Qaida, et al, Case No 03-CV-6978 (RCC) (SDNY)**
- **"Proof of Service", datiert vom 12. Dezember 2004.+**

Der genannte Dienst hat die oben erwähnten Gerichtsakten samt seiner Note Nr. 1050-IE datiert vom 7. Dezember 2004, ohne Kommentar seitens des iranischen Aussenministeriums zurückerhalten. Die Bestätigung des 'proof of service' ist datiert vom 12. Dezember 2004 und die Legalisierung wurde am 21. Dezember 2004 in Bern vorgenommen.

Das Departement benützt auch diesen Anlass, um die Botschaft seiner ausgezeichneten Hochachtung zu versichern.

Bern, 22. Dezember 2004



Beilagen erwähnt

An die Botschaft der  
Vereinigten Staaten von Amerika

Informal Embassy translation from the German of SPP Note No. 22404 dated December 22, 2004:

"The Federal Department of Foreign Affairs, referring to Embassy's notes Nos. 1453 of November 22, 2004 and its Note No. 22378 of December 13, 2004 concerning the transmission of the court documents in the case Federal Insurance Company, et al. v. al-Qaida, et al., has the honor to submit to the Embassy of the United States of America the following enclosures received from the American Interests Section of the Swiss Embassy in Tehran.

- Court documents: Judicial Assistance: Summons, Complaint and Notice of Suit Pursuant to the Foreign Sovereign Immunities Act - Federal Insurance Company, et al. v. al-Qaida, et al. Case No. 03-CV-6978 (RCC) (SDNY)
- 'Proof of service' dated December 12, 2004.

The Interests Section received back the above mentioned court documents as well as its Notes No. 1050-IE dated December 7, 2004 from the Iranian Ministry of Foreign Affairs with no comments. The confirmation of the 'proof of service' is dated December 12, 2004 and the legalization was done in Bern on December 21, 2004.

Complimentary close.

Bern, December 22, 2004

Enclosures as stated

SPECIFIC AUTHENTICATION CERTIFICATE

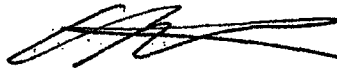
Confederation of Switzerland )  
Bern, Canton of Bern ) SS:  
Embassy of the United States of America )

I certify that the annexed document is executed by the genuine signature and seal of the following named official who, in an official capacity, is empowered by the laws of Switzerland to execute that document.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Ruth EGGER

(Typed name of Official who executed the annexed document)



(Signature of Consular Officer)

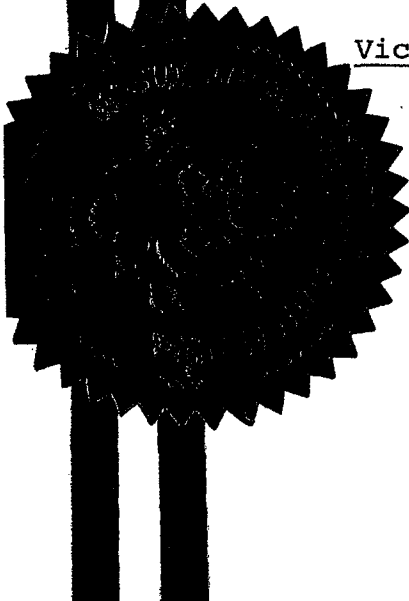
Christopher K. Derrick

(Typed name of Consular Officer)

Vice Consul of the United States of America  
(Title of Consular Officer)

December 27, 2004

(Date)





**EMBASSY OF SWITZERLAND**

**No. 1050-IE**

The Embassy of Switzerland, Foreign Interests Section, in Tehran presents its compliments to the Ministry of Foreign Affairs of the Islamic Republic of Iran and has the honor to refer the Ministry of Foreign Affairs of the Islamic Republic of Iran to the lawsuit Federal Insurance Company, et al. v. al-Qaida, et al. which is pending in the U.S. Federal District Court for the Southern District of New York, case No. 03-CV-6978 (RCC). The Islamic Republic of Iran is a defendant in this case. The Foreign Interests Section herewith transmits a summons and complaint herewith. The U.S. Federal District Court has requested the transmittal of these documents. This note constitutes transmittal of these documents upon the Government of the Islamic Republic of Iran as contemplated in Title 28, United States Code, Section 1608 (a)(4) and 1608(e).

Under applicable U.S. law a defendant in a lawsuit must file an answer to the complaint or some other responsive pleading within 60 days for the date of transmittal of the complaint, in this case the date of this note. Failing to do so, a defendant risks the possibility of having judgment entered against it without the opportunity to present arguments or evidence on its behalf. Therefore, the Foreign Interests Section requests that the enclosed summons and complaint be forwarded to the appropriate authority of the Islamic Republic of Iran with a view towards taking whatever steps are necessary to avoid a default judgment.

In addition to the summons and complaint, the Foreign Interests Section is enclosing a notice of suit prepared by the plaintiff, which summarizes the nature of the case and includes references to U.S. laws concerning suits against foreign States.

The Foreign Interests Section has been advised that under the laws of the United States, any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to consult an attorney in the United States. Otherwise proceedings will continue without an opportunity to present arguments or evidence. It is the practice of the U.S. Department of State to be available to discuss the requirements of U.S. law with counsel. The U.S. Government is not a party to this case and cannot represent other parties in this matter.

The Embassy of Switzerland, Foreign Interests Section, avails itself of this opportunity to renew to the Ministry of Foreign Affairs of the Islamic Republic of Iran the assurances of its highest consideration.

**Attachments:**

- 1 – Summons, Complaint, Notice of Suit
- 2 – Translations

**Tehran – December 07, 2004 (Azar 17, 1383)**

**Ministry of Foreign Affairs of the  
Islamic Republic of Iran  
Tehran**

I, Ernst Hofstetter, Head of the Foreign Interests Section, Embassy of Switzerland, in Tehran, certify that this is a true copy of the Embassy of Switzerland, Foreign Interests Section diplomatic note number 1050-IE dated December 07, 2004, and delivered to the Ministry of Foreign Affairs of the Islamic Republic of Iran on December 12, 2004.



Ernst Hofstetter  
Head of Foreign Interests Section

Tehran – December 12, 2004

I, Ernst Hofstetter, Head of the Foreign Interests Section, Embassy of Switzerland, in Tehran, certify that this is a true copy of the Embassy of Switzerland, Foreign Interests Section diplomatic note number 1050-IE dated December 07, 2004, and delivered to the Ministry of Foreign Affairs of the Islamic Republic of Iran on December 12, 2004.



**APOSTILLE**

(Convention de la Haye du 5 octobre 1961)

1. Country: SWISS CONFEDERATION

This public document

Ernst Hofstetter

2. has been signed by

E. Hofstetter

3. acting in the capacity of officers

4. bears the seal/stamp of

Embassy of Switzerland US Interests Section Tehran

Certified

5. at Berne

6. the 21 December 2004

7. by Ruth Egger

functionary of the Swiss federal Chancellery

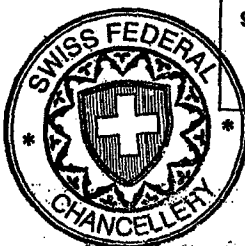
8. No 10964

9. Seal/stamp:

Swiss federal Chancellery

10. Signature:

Ruth Egger



SPECIFIC AUTHENTICATION CERTIFICATE

Confederation of Switzerland )  
Bern, Canton of Bern ) SS:  
Embassy of the United States of America )

I, Christopher K. DERRICK, a consular officer at the Embassy of the United States at Bern, Switzerland, certify that this is a true copy of Embassy note number 14537 dated November 22, 2004, which was transmitted to the Swiss Ministry of Foreign Affairs on November 23, 2004 for further transmission to the American Interests Section of the Swiss Embassy in Tehran, Iran.

  
(Signature of Consular Officer)

Christopher K. DERRICK  
(Typed name of Consular Officer)

Vice Consul of the United States of America  
(Title of Consular Officer)

December 27, 2004  
(Date)

## **EXHIBIT B**



**United States Department of State**

*Washington, D.C. 20520*

December 10, 2004

Mr. Joseph LaMura  
Chief Deputy Clerk  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

re: **Federal Insurance Company, et al. v.  
al-Qaida, et al., Case Number 03-CV-6978 (RCC)**

Dear Mr. LaMura:

I am writing regarding the Court's request for transmittal of a summons, complaint, and notice of suit to the Republic of Sudan pursuant to 28 U.S.C. Section 1608(a)(4) as a defendant in the above referenced case.

The American Embassy in Khartoum, Sudan transmitted the summons, complaint and notice of suit to the Ministry of Foreign Affairs of the Republic of Sudan under cover of a diplomatic note No. CONS/11/29/2004/636 dated November 29, 2004. A certified copy of the Embassy's diplomatic note, and a copy of the documents transmitted to the Ministry of Foreign Affairs are enclosed herewith in accordance with the procedures established for the implementation of the Foreign Sovereign Immunities Act.

Should you have any questions regarding this matter, please do not hesitate to contact me at (202) 736-9115.

Sincerely,

A handwritten signature in dark ink, appearing to read "William P. Fritzlen".

William P. Fritzlen  
Attorney Adviser

Office of Policy Review and Interagency Liaison

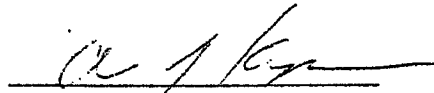
Enclosures As Stated

cc: J. Scott Tarbutton  
Cozen O'Connor Attorneys  
1900 Market Street  
Philadelphia, PA 19103-3508



Republic of Sudan )  
State of Khartoum ) SS:  
City of Khartoum )  
Embassy of the United States of America )

I, Allen J. Kepchar, Consular Officer of the United States of America in Khartoum, Sudan, certify that this is a true copy of the Embassy of the United States of America, diplomatic note number CONS/11/29/2004/636 dated November 29, 2004 and delivered to the Ministry of Foreign Affairs of the Republic of Sudan on November 30, 2004.

  
(Signature)

ALLEN J. KEPCHAR  
CONSULAR OFFICER

November 30, 2004



*Embassy of the United States of America*

*Khartoum, Sudan*

CONS/11/29/2004/636

The Embassy of the United States of America presents its compliments to the Ministry of Foreign Affairs of the Republic of Sudan and has the honor to refer the Ministry to the lawsuit entitled "Federal Insurance Company, et al. v. Al-Qaida, et al.," which is pending in the Federal District Court for the Southern District of New York, Case No. 3-CV-978 (RCC) in which the Government of the Republic of Sudan is a defendant.

The Embassy herewith transmits a Notice of Suit with summons and complaint. This note constitutes transmittal of these documents to the Government of Sudan as contemplated in Title 28, United States Code, Section 1608(a)(4).

Under applicable United States law a defendant in a lawsuit must file an answer to the complaint or some other responsive pleading within sixty (60) days from the date of transmittal of the complaint (i.e., the date of this Diplomatic Note) or face the possibility of having final judgment entered against it without the opportunity of presenting evidence or arguments in its behalf. Accordingly, the Embassy requests that the enclosed summons, complaint and notice of suit be forwarded to the appropriate authority of the Republic of Sudan with a view towards taking whatever steps are necessary to avoid a default judgment.

Under the laws of the United States, any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to

consult an attorney in the United States. Otherwise, proceedings will continue without an opportunity to present evidence or possible defenses. Consistent with practice, the United States Department of State is available to discuss with counsel the requirements of U.S. law. The United States Government is not a party to this litigation and cannot represent other parties in this matter.

In addition to the summons and complaint, the Embassy is enclosing a notice of suit prepared by the plaintiff, which summarizes the nature of the case and includes references to pertinent U.S. laws concerning suits against foreign states.

The Embassy of the United States of America avails itself of this opportunity to renew to the Ministry of Foreign Affairs of the Republic of Sudan the assurances of its highest consideration.

Embassy of the United States of America  
November 29, 2004



**Attachments:**

1. Summons, Complaint and Notice of Suit
2. Translations into Arabic

## **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Federal Insurance Co., et al

Plaintiff,

-V-

Al Qaida, et al

Defendants..

FILED  
U.S. DISTRICT COURT  
2004 JUN -4 P 12:58  
CERTIFICATE OF MAILING  
S.D. OF N.Y.

#133

03CV 6978 (RCC)

I, J. Michael McMahon, Clerk of Court for the Southern District of New York, do hereby certify that on the

June 4, 2004

I served the

SUMMONS & COMPLAINT  
NOTICE OF SUIT  
AND AFFIDAVIT OF TRANSLATOR

filed and issued herein on the

Sept. 10, 2004

Pursuant to the foreign sovereign immunities act 28 U.S.C. §1608(a)(3), by mailing by registered mail, return receipt requested, at the United States Post Office, Chinatown Station, New York, NY, a copy of each thereof, securely enclosed in a post-paid wrapper addressed to:

See attached for listing of Defendants

That annexed to the original hereof is registered mail receipt(s)

#RB632958 829 # \_\_\_\_\_ # \_\_\_\_\_

# \_\_\_\_\_ # \_\_\_\_\_ # \_\_\_\_\_

(Chinatown Station) that was issued at my request as aforementioned,

J. Michael McMahon

# United States District Court

SOUTHERN

DISTRICT OF

NEW YORK

IN RE TERRORIST ATTACK  
ON SEPTEMBER 11, 2001

Federal Insurance Company, et al.

V.

al-Qaida, et al.

SUPPLEMENTAL

SUMMONS IN A CIVIL CASE

CASE NUMBER: 03 MD 1570  
03CV6978 RCC

TO: (Name and address of defendant)

ALL DEFENDANTS ON ATTACHED RIDER

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Michael J. Sommi, Esq.  
Cozen O'Connor  
45 Broadway Atrium  
Suite 1600  
New York, NY 10006

an answer to the complaint which is herewith served upon you, within 60 (Sixty) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

MAR 10 2004

CLERK

*Melanie L. Lopez*

DATE

(BY) DEPUTY CLERK

AO 440 (Rev. 10/93) Summons In a Civil Action -SDNY WEB 4/99

<b>RETURN OF SERVICE</b>		
Service of the Summons and Complaint was made by me <sup>1</sup>		DATE
NAME OF SERVER (PRINT)		TITLE
<i>Check one box below to indicate appropriate method of service</i>		
<input type="checkbox"/> Served personally upon the defendant. Place where served: _____ _____		
<input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: _____ _____		
<input type="checkbox"/> Returned unexecuted: _____ _____ _____		
<input type="checkbox"/> Other (specify): _____ _____ _____		
<b>STATEMENT OF SERVICE FEES</b>		
TRAVEL	SERVICES	TOTAL
<b>DECLARATION OF SERVER</b>		
<p style="text-align: center;">I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on _____ Date</p> <p style="text-align: right;">_____ Signature of Server</p> <p style="text-align: right;">_____ Address of Server</p>		

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

**al Qaida  
Egyptian Islamic Jihad  
Asbat al-Ansar  
Al Gama'a al-Islamiyya  
Salafist Group for Call and Combat  
Lashkar I Janghvi  
Lashkar-e Tayyiba  
Jemaah Islamiya Organization  
Lebanese Hezbollah  
Abu Sayef Group  
Algerian Armed Islamic Group  
Hamas  
Palestine Islamic Jihad  
The Islamic Republic of Iran  
Republic of Iraq  
The Republic of the Sudan  
Syrian Arab Republic  
The Kingdom of Saudi Arabia  
Usama bin Laden  
Muhammad Atif a/k/a Subhi Sitta a/k/a Abu Hafs al-Masri  
Sayf al-Adl  
Shaykh Sa'id a/k/a Mustafa Muhammad Ahmad  
Abu Hafs the Mauritanian a/k/a Mahfouz Ould al-Walid a/k/a Khalid al-Shanqiti  
Ibn al-Shaykh al-Libi  
Abu Zubaydah a/k/a Zayn al Abidin Muhammad Husayn Tariq  
Abu al-Hadi al-Iraqi a/k/a Abu Abdullah  
Ayman al-Zawahiri  
Thirwat Salah Shihata  
Tariq Anwar al-Sayyid Ahmad a/k/a Fathi a/k/a Amr al-Fatih  
Muhammad Salah  
Makhtab Al-Khidamat a/k/a Al-Khifaf  
Al-Itihaad al-Islamiya (AIAI)  
Islamic Army of Aden  
Wafa Humanitarian Organization  
Al-Rashid Trust  
Mamoun Darkazanli Import-Export Company  
Nurjaman Riduan Ismuddin a/k/a Hambali  
Mohammed Iqbal Abdurrahman a/k/a/ Abu Jibril  
Benevolence International Foundation  
Benevolence International Fund  
Bosanska Idealna Futura  
Global Relief Foundation a/k/a Foundation Secours Mondial  
Mounir El Motassadeq  
Ramzi Binalshibh  
Said Bahaji  
Turkistan Islamic Movement**



Wa'el Hamza Julaidan  
Adel Ben Soltane  
Nabil Benattia  
Yassine Chekkouri  
Riadh Jelassi  
Mendi Kammoun  
Samir Kishk  
Tarek Ben Habib Maaroufi  
Abdelhalim Remadna  
Mansour Thaer  
Lazhar Ben Mohammed Tlili  
Habib Waddani  
Akida Bank Private Limited  
Akida Investment Co  
Nasreddin Group International Holding Ltd.  
Nasco Nasreddin Holding A.S.  
Nascotex S.A.  
Nasreddin Foundation  
BA Taqwa for Commerce and Real Estate Company Ltd.  
Miga - Malaysian Swiss, Gulf and African Chamber  
Gulf Center S.R.L.  
Nascoservice S.R.L.  
Nasco Business Residence Center SAS Di Nasreddin Ahmed Idris EC  
Nasreddin Company Nasco SAS Di Ahmed Idris Nassneddin EC  
Nada International Anstalt  
Nasreddin International Group Limited Holding  
The Aid organization of the Ulema  
Ahmed Idris Nasreddin  
Youssef Nada  
Abdelkadir Mahmoud Es Sayed  
Khalid Al-Fawaz  
Abu Hamza Al-Masri  
Mohamed Ben Belgacem Aouadi  
Mokhtar Boughougha  
Tarek Charaabi  
Sami Ben Khemais Essid  
Lased Ben Heni  
Somalia Branch of the Al-Haramain Islamic Foundation  
Bosnia-Herzegovina branch of Al-Haramain Islamic Foundation  
Umma Tameer-E-Nau (UTN)  
Bashir-Ud-Din Mahmood  
Abdul Majeed  
S.M. Tufail  
Al-Barakaat  
Al Taqwa/Nada Group  
Aaran Money Wire Service Inc.

Al Baraka Exchange LLC  
Al Barakaat Bank  
Al-Barakat Bank of Somalia (BSS)  
Al-Barakat Finance Group  
Al-Barakat Financial Holding Co.  
Al-Barakat Global Telecommunications  
Al-Barakat Group of Companies Somalia Limited  
Al-Barakat International a/k/a Baraco Co  
Al-Barakat Investments  
Al-Barakat Wiring Service  
Al Taqwa Trade, Property and Industry Company Limited  
ASAT Trust  
Bank of al Taqwa Limited  
Baraka Trading Company  
Barakaat Boston  
Barakaat Construction Company  
Barakaat Enterprise  
Barakaat Group of Companies  
Barakaat International  
Barakaat International Foundation  
Barakaat International, Inc.  
Barakaat North America, Inc.  
Barakaat Red Sea Telecommunications  
Barakaat Telecommunications Co. Somalia  
Barakat Bank and Remittances  
Barakat Computer Consulting (BCC)  
Barakat Consulting Group (BCG)  
Barakat Global Telephone Company  
Barakat International Companies (BICO)  
Barakat Post Express (BPE)  
Barakat Refreshment Company  
Barakat Wire Transfer Company  
Barakat Telecommunications Company Limited (BTELCO)  
Barako Trading Company, LLC  
Global Services International  
Heyatul Ulya  
Nada Management Organization  
Parka Trading Company  
Red Sea Barakat Company Limited  
Somalia International Relief Organization  
Somalia Internet Company  
Somalia Network AB  
Youssef M Nada & Co. Gesellschaft MBH  
Husseln Mahmud Abdulkadir  
Abdirasik Aden  
Abbas Abdi Ali

Case 1:03-md-01570-GBD-FM Document 1208 Filed 09/08/05 Page 26 of 44  
**Federal Insurance Company et al., v al Qaida et al.**  
 03 cv 6978 (RCC)

Abdi Adulaziz Ali  
 Yusaf Ahmed Ali  
 Dahir Ubeidullahi Aweys  
 Hassan Dahir Aweys  
 Garad Jama  
 Ali Ghaleb Himmat  
 Albert Fredrich Armand Huber  
 Liban Hussein  
 Ahmed Nur Ali Jim'ale  
 Abdullahi Hussein Kahie  
 Mohammed Mansour  
 Zeinab Mansour-Fattah  
 Abdullah Ahmed Abdullah a/k/a Abu Mariam a/k/a Abu Mohamed Al-Masri a/k/a Saleh  
 Haji Abdul Manan Agha a/k/a Abd Al-Man'am Saiyid  
 Al-Hamati Sweets Bakeries  
 Muhammad Al-Hamati a/k/a Mohammad Hamdi Sadiq Al-Ahdal a/k/a Abu Asim Al-Makki; Mohammed Hamdi al-Ahdal  
 Amin Al-Haq a/k/a Dr. Amin Ah Haq a/k/a Muhammad Amin a/k/a Dr. Amin Ul-Haq  
 Saqar Al-Sadawi  
 Ahmad Sa'id Al-Kadr a/k/a Abu Abd Al-Rahman Al-Kanadi  
 Anas Al-Liby a/k/a Anas Al-Libi a/k/a Nazim Al-Raghie a/k/a Nazih Abdul Hamed Al-Raghie a/k/a Anas Al-Sabai  
 Ahmad Ibrahim Al- Mughassil a/k/a Abu Omran a/k/a Ahmed Ibrahim Al-Mughassil  
 Abdelkarim Hussein Mohamed Al-Nasser  
 Al-Nur Honey Press Shops a/k/a Al-Nur Honey Center  
 Yasin Al-Qadi  
 Sa'D Al-Sharif  
 Al-Shifa' Honey Press for Industry and Commerce  
 Ibrahim Salih Mohammed Al-Yacoub  
 Ahmed Mohammed Hamed Ali a/k/a Ahmed Mohammed Abdurehman a/k/a Abu Fatima a/k/a Abu Islam a/k/a Abu Khadijah a/k/a Ahmed Hamed a/k/a Ahmed the Egyptian a/k/a Ahmed Ahmed a/k/a Ahamad Al-Masri a/k/a Abu Islam Al-Surir a/k/a Ahmed Mohammed Ali a/k/a Hamed Ali a/k/a Ahmed Hemed a/k/a Ahmed Shieb a/k/a Shuaib  
 Ali Atwa a/k/a Ammar Mansour Bouslim a/k/a Hassan Rostom Salim  
 Muhsin Musa Matwalli Atwah a/k/a Abdel Rahman a/k/a Abdul Rahman a/k/a Abdul Rahman Al-Muhajir a/k/a Mohammed K.A. Al-Namer  
 Bilal Bin Marwan  
 Ayadi Chafiq Bin Muhammad a/k/a Ben Muhammad Aladi a/k/a Ben Muhammad Alady a/k/a Ben Muhammad Ayadi Chafik a/k/a Ben Muhammad Ayadi Shafiq  
 Mamoun Darkazanli  
 Ali Saed Bin Ali El-Hoorie a/k/a Ali Saed Bin Ali Al-Houri a/k/a Ali Saed Bin Ali El-Houri  
 Mustafa Mohamed Fadhil a/k/a Abd Al Wakil Al Masri a/k/a Abu Al-Nubi a/k/a Hassan Ali a/k/a Abu Anis a/k/a Moustafa Ali Elblshy a/k/a Mustafa Muhamad Fadil a/k/a

**RIDER**  
 Case 1:03-md-01570-GBD-FM Document 1208 Filed 09/08/05 Page 27 of 44  
**Federal Insurance Company et al., v al Qaida et al.**  
**03 cv 6978 (RCC)**

Mustafa Fazul a/k/a Hussein a/k/a Abu Jihad a/k/a Khalid a/k/a Nu Man a/k/a Mustafa Mohammed a/k/a Abu Yussrr  
 Ahmed Khalfan Ghailani a/k/a Ahmed the Tanzanian a/k/a Foopie a/k/a Fupi a/k/a Abu Bakr Ahmad a/k/a A. Ahmed a/k/a Abubakar Ahmed a/k/a Abubakar K. Ahmed a/k/a Abubakar Khalfan Ahmed a/k/a Abubakary K. Ahmed a/k/a Ahmed Khalfan Ahmed a/k/a Ahmad Al Tanzani a/k/a Ahmed Khalfan Ali a/k/a Abu Bakr a/k/a Abubakary Khalfan Ahmed Ghailani a/k/a Ammed Ghailani a/k/a Ahmad Khalafan Ghilani a/k/a Mahafudh Abubakar Ahmed Abdallah Hussein a/k/a Abu Khabar a/k/a Ahmed Khalfan a/k/a Shariff Omar Mohammed  
 Riad Hijazi a/k/a Abu-Ahmad Al-Amriki a/k/a Abu-Ahmad Al-Hawen a/k/a Rashid Al-Maghribi a/k/a Abu-Ahmad Al-Shahid a/k/a M Raed Hijazi  
 Hasan Izz-Al-Din a/k/a Ahmed Garbaya a/k/a Sa-Id a/k/a Samir Salwwan  
 Jaish-I-Mohammed a/k/a Army of Mohammed  
 Jam'Yah Ta'Awun Al-Islamia a/k/a Jam'lyat Al Ta'Awun Al Islamiyya a/k/a JIT a/k/a Society of Islamic Cooperation  
 Mufti Rashid Ahmad Ladehyanoy a/k/a Mufti Rasheed Ahma a/k/a Mufti Rashid Ahmad Ludhianvi a/k/a Mufti Rashid Ahmad Wadehyanoy  
 Fazul Abdullah Mohammed a/k/a Fazul Abdalla a/k/a Fazul Adballah a/k/a Abu Aisha a/k/a Abu Seif Al Sudani a/k/a Fadel Abdallah Mohammed Ali a/k/a Abdalla Fazul a/k/a Abdallah Fazul a/k/a Abdallah Mohammed Fazul a/k/a Haroon Fazul a/k/a Harun Fazul a/k/a Haroon a/k/a Fadhil Haroun a/k/a Harun a/k/a Abu Luqman a/k/a Fazul Mohammed a/k/a Fazul Abdilahi Mohammed a/k/a Fouad Mohammed a/k/a Fadil Abdallah Muhamad  
 Khalid Shaikh Mohammed  
 Fahid Mohammed Ally Msalam a/k/a Usama Al-Kini a/k/a Fahid Mohammed Ally a/k/a Fahad Ally Msalam a/k/a Fahid Mohammed Ali Msalam a/k/a Mohammed Ally Msalam a/k/a Fahid Mohammed Ali Musalaam a/k/a Fahid Muhamad Ali Salem Rabita Trust  
 Ansar al-Islam (AI) a/k/a Jund al-Islam  
 Youssef Abdaoui a/k/a Abu Abdullah a/k/a Abdellah a/k/a Abdullah Mohammed Amine Akli  
 Mohrez Amdouni a/k/a Fabio Fusco a/k/a Mohammed Hassan a/k/a Tuale Abu Chiheb Ben Mohamed Ayari a/k/a Abu Hohem Hichem  
 Mondher Baazaoui a/k/a Hamza  
 Llonel Dumont a/k/a Bilal a/k/a Hamza a/k/a Jacques Brougere  
 Moussa Ben Amor Essaadi a/k/a Dah Dah a/k/a Abdelrahmman a/k/a Bechir  
 Rachid Fehar a/k/a Aminedel Belgio a/k/a Djaffar  
 Brahim Ben Hedili Hamami  
 Khalil Jarraya a/k/a Khalil Yarraya a/k/a Aziz Ben Narvan Abdel' a/k/a Amro a/k/a Omar a/k/a Amrou a/k/a Amr  
 Mounir Ben Habib Jerraya  
 Fouzi Jendoubi aka Said / aka Samir  
 Fethi Ben Rebai Masri a/k/a Amor a/k/a Omar Abu a/k/a Fethi Alic  
 Najib Ouaz  
 Ahmed Hasni Rarbo a/k/a Abdallah a/k/a Abdulla  
 Nedat Saleh a/k/a Hitem

Case 1:03-md-01570-GBD-FM Document 1208 Filed 09/08/05 Page 28 of 44  
~~BIDEN~~  
**Federal Insurance Company et al., v al Qaida et al.**  
03 cv 6978 (RCC)

Abdelghani Mzoudi  
Gulbuddin Hekmatyar  
Imad Mughniyeh  
Muhammad Omar  
Islamic International Brigade  
Special Purpose Islamic Regiment  
Riyadus-Salikhin Recognizance and Sabotage Battalion of Chechen Martyrs  
Princess Haifa Al-Faisal  
Prince Bandar Iban Sultan  
Osama Bassnan  
Fahad Al-Thumairy  
World Assembly of Muslim Youth  
Sheikh Ahmed Salim Swedan  
Muhammad Abu-Islam  
Abdullah 'Qassim  
Hashim Abdulrahman  
Jamal Al-Badawi  
Mohammed Omar Al-Harazi  
Walid Al-Sourouri  
Fatha Adbul Rahman  
Yasser Al-Azzani  
Jamal Bakhorsh  
Ahmad Al-Shinni  
Jamil Qasim Saeed  
Abu Abdul Rahman  
Mohamed Bayazid  
Abu Musab Zarqawi  
Sheikh Omar Bakri Muhammad  
Abdul Fattah Zammar  
Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab  
Bensayah Belkacem  
Sabir Lamar  
Wadih El-Hage  
Wali Khan Amin Shah  
Zacarias Moussaoui  
The Taliban  
Maulvi Abdul Kabir  
Jalil Shinwari  
Noor Jall  
Abdel Hussein  
Adu Agab  
National Islamic Front  
Hassan Turabi  
Iss El-Din El Sayed  
Lashkar Redayan-E-Islami  
Ahmad Salah a/k/a Salim

Abd Al-Mushin Al-Libi  
Abdul Rahman Khaled Bin Mahfouz  
Abdul Rahman Yasin  
Abdulla Al Obaid  
Abdula Bin Laden  
Advice and Reformation Committee  
Afghan Support Committee  
Al Khaleejia for Expert Promotion and Marketing Company  
Al-Haramain Islamic Foundation  
Enaam M Arnanout  
International Development Foundation  
International Islamic Relief Organization  
International Institute of Islamic Thought  
Islamic Cultural Institute of Milan  
Jamal Barzinji  
Khaled Bin Mahfouz  
Mohammed Jamal Khalifa  
Mohammed Salim Bin Mahfouz  
Muslim World League  
National Commercial Bank  
Prince Nayef Bin Abdulaziz Al Saud  
Prince Sultan Bin Abdulaziz Al Saud  
Rabih Haddah  
SAAR Foundation  
Saudi Sudanese Bank  
Al Shamal Islamic Bank a/k/a Shamel Bank a/k/a Bank El Shamar  
Sheikh Abu Bdul Aziz Nagi  
Sheik Adil Galil Batargy a/k/a Adel Abdul Jalil Batterjee  
Suleiman Abdel Aziz Al Rajhi  
Taba Investments  
Tanzanite King  
Ulema Union of Afghanistan  
Wadi Al Aqlq  
Infocus Tech of Malaysia  
Yazid Sufaat of Kuala Lumpur Malaysia  
Al-Shaykh Al-Iraqi  
Azzam Service Center  
Abu Hajer Al Iraqi  
Prince Mohammed Al Faisal Al Saud  
Al-Hijrah Construction and Development Limited  
Gum Arabic Company Limited  
Al Shamal For Investment and Development  
Saleh Abdullah Kamel  
Al Baraka Investment and Development Company  
Saudi Dallah Al Baraka Group LLC  
Islamic Investment Company of the Gulf

Case 1:03-md-01570-GBD-FM Document 1208 Filed 09/08/05 Page 30 of 44  
Federal Insurance Company et al., v al Qaida et al.  
03 cv 6978 (RCC)

Dar-Al-Maal Al Islami  
Al-Bir Saudi Organization  
Mohammad S. Mohammad  
Tadamon Islamic Bank  
Mustasim Abdel-Rahim  
National Fund for Social Insurance  
Abdul-Rahim Mohammed Hussein  
Al Amn Al-Dakhili  
Al Amn Al-Khariji  
Abd Al Samad Al-Ta'ish  
Mohamed Sadeek Odeh  
Abdel Barry  
Mahdi Chamran Savehi  
Mohammed Sarkawi  
Al Tawhid  
Haji Mohamad Akram  
Abdallah Omar  
Umar Faruq  
Abd Al-Rahim Al-Nashiri  
Prince Turki Al Faisal Al Saud  
Prince Abdullah Al Faisal Bin Abdulaziz Al Saud  
Prince Salmin Bin Abdul Aziz Al Saud  
Mullah Kakshar  
Abdulaziz Bin Abdul Rahman Al Saud  
Haydar Mohamed Bin Laden  
Mohammed Bin Abdulrahman Al Ariefy  
Faisal Group Holding Company  
Alfaisaliah Group  
Bashsh Hospital  
Mushayt for Trading Establishment  
Abdullah Bin Abdul Muhsen Al Turki a/k/a Al Turki  
Saudi High Commission  
Abdul Aziz Al Ibrahim a/k/a Al Ibrahim  
Tarek Ayoubi  
Al Anwa  
Help African People  
Ibrahim Bin Abdul Aziz Al Ibrahim Foundation  
Mercy International Relief Agency  
Islamic Movement of Uzbekistan  
Saudi Bin Laden Group  
Bakr M. bin Laden  
Salem Bin Laden  
Saleh Gazaz  
Mohammed Bahareth  
Abdullah Bin Said  
Mohammed Nur Rahmi



**Federal Insurance Company et al., v al Qaida et al.**  
**03 cv 6978 (RCC).**

Tarek M. Bin Laden  
Omar M. Bin Laden  
Mohammed Bin Laden Organization  
Saudi Bin Laden International Company  
Yeslam M Bin Laden  
Global Diamond Resource  
Human Concern International Society  
Talal Mohammed Badkook  
Dr. Mohaman Ali Elgari  
New Diamond Holdings  
M.M. Badkook Company for Catering & Trading  
Al-Mustaqbal Group  
National Management Consultancy Center  
Al-Rajhi Banking & Investment Corporation  
Saleh Abdulaziz Al-Rajhi  
Abdullah Sulaiman Al-Rajhi  
Khalid Sulaiman Al-Rajhi  
Al-Watania Poultry  
Mar-Jac Poultry  
Mar-Jac Investments, Inc.  
Piedmont Poultry  
Salim Bin Mahfouz  
SNCB Corporate Finance Limited  
SNCB Securities Limited in London  
SNCB Securities Limited in New York  
Saudi Economic and Development Company  
Zakat Committee  
Red Crescent Saudi Committee  
Blessed Relief Foundation  
Abdulkarim Khaled Uusuf Abdulla  
Al-Birr  
Hisham Amanout  
Hezb-e-Islami  
Saif Al Islam El Masry  
Syed Suleman Ahmer  
Mazin M.H. Bareth  
Shahir Abdulraoof Batterjee  
Zahir H. Kazmi  
Muzaffar Kahn  
Soliman J. Khudeira  
Jamal Nyrabeh  
Ahmad Ajaj  
Success Foundation  
Abdul Rahman Alamoudi  
American Muslim Foundation  
Mohammed Omeish



Adnan Basha  
Mahmoud Jaballah  
Arafat El-Ashi  
Moro Islamic Liberation Front  
Jamal Ahmed Mohammed  
Mohammed Khatib  
Saudi Joint Relief Committee  
Taibah International Aid Association  
Islamic African Relief Agency  
Tarik Hamdi  
Fazeh Ahed  
Sanabil Al-Khair  
Sana-Bell, Inc.  
Sanabel Al-Kheer, Inc.  
Khaled Nouri  
Abdullah M Al-Mahdi  
Tareq M Al-Swaidan: Abdul Al-Moslah  
Salah Badahdh  
Hassan A.A Bahfzallah  
M. Yaqub Mirza  
Ihab Ali  
Samir Salah  
Ibrahim Hassabella  
Hisham Al-Talib  
Abu Sulayman  
Ahmed Totonji  
Iqbal Yunus  
M. Omar Ashraf  
Mohammed Jaghlit  
Muhammad Ashraf  
Sherif Sedky  
African Muslim Agency  
Aradi, Inc.  
Grove Corporate, Inc.  
Heritage Education Trust  
Mena Corporation  
Reston Investments, Inc.  
Safa Trust  
Sterling Charitable Gift Fund  
Sterling Management Group  
York Foundation  
National Development Bank  
Dallah Avco Trans Arabia Co. Ltd.  
Omar Al Bayoumi a/k/a Abu Imard  
Masjed Al Madinah Al Munawarah a/k/a Masjid Al Madinah Al Munawarah  
Aqsa Islamic Bank

**Aqeel Al-Aqeel  
Mansouri Al-Kadi  
Soliman H.S. Al-Buthe  
Perouz Seda Ghaty  
Ahmed Ibrahim Al Najjar  
Adel Muhammad Sadiq Bin Kazem  
Saudi American Bank  
Abdulaziz Bin Hamad  
Khalil A. Kordi  
Rashid M Al Romaizan  
Abdulaziz Bin Hamad Al Gosaibi  
Saudi Cement Company in Damman  
Omar Sulaiman Al-Rajhi  
Arab Cement Company  
Zeinab Mansour-Fattouh  
Mohammed Chehade  
Hazem Ragab  
Mohammed Alchurbaji  
Mustafa Al-Kadir  
Abu Al-Maid  
Sulaiman Al-Ali  
Muslim World League NY Offices  
Abdullah Bin saleh Al-Obaid  
Taha Jaber Al-Alwani  
Ibrahim S Abdullah  
Mohammed Bin Faris  
Dr. Mahmoud Dakhil  
Abdul Rahman Al Swailem  
Delta Oil Company  
Nimir, LLC  
Arab Bank, PLC  
Dubai Islamic Bank  
Nada Management Organization, SA  
Ary Group  
Islamic Cultural Center of Geneva  
Hani Ramadan  
The Committee for the Defense of Legitimate Rights  
Proyectos Y Promociones Iso  
Afamia, SL  
Cobis  
Abrash Company  
Promociones Y Construcciones Tetuan Pricote, S.A.  
Contratas Gloma  
Eurocovia Obras, S.A.  
Proyectos Y Promociones Paradise, S.L.  
Proyectos Edispan**

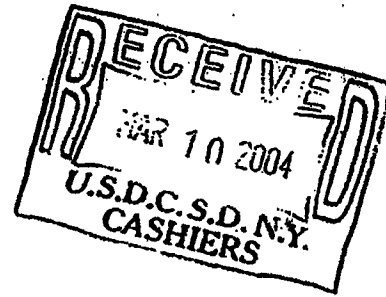
Ghasoub Al Abrash  
Mustaf Ahmed Al-Hisawi a/k/a Sheik Saeed  
Imad Eddin Barakat Yarkas a/k/a Abu Dahdah  
Muhammed Galeb Kalaje Zuoyadi a/k/a Abu Talha  
Bassam Dalati Satut  
Abdalrahman Alarnout Abu Aljer a/k/a Abu obed  
Mohammed Khair Al Saqqa a/k/a Abu Al Darda  
Mohammed Ali Sayed Mushayt  
Mohammed Hussein Al-Amoudi  
Abu Qatada Al-Filistini a/k/a Abu Ismail a/k/a Abu Umar a/k/a Abu Omar Omar a/k/a  
Abu Umar Takfiri a/k/a Abu Umar umar a/k/a Ali-Samman Uthman a/k/a Omar  
Mahmoud Uthman a/k/a Umar Uthman  
Yassir Al-Sirri a/k/a Ammar  
Mohammed Al Massari  
Lujain Al-Iman  
Ziyad Khaleel  
Ibrahim bah  
Mamdouh Mahmud Salim a/k/a Abu Hajer Al Iraqi  
Sheikh Abdullah Azzam a/k/a Abu Muhammed  
Abdullah Samil Bahmadan  
Essam Al Ridi  
Omar Abu Omar  
Mohammed Ali Hasan Al Moayad  
Al Farooq Mosque  
Yousef Jameel  
Ibrahim Muhammed Afandi  
Mohammed Bin Abdullah Al-Jomaith  
Abdulrahman Hassan Sharbatly  
Salahuddin Abduljawad  
Ahmed Zaki Yamani  
Ahmad Al Harbi  
Mohammed Al-Issai  
Hamad Hussaini  
Abu Rida Al Suri a/k/a Mohammed Loay Bayazid  
Saudi Red Crescent  
Ahmed Brahim  
Abu Musab Al-Zarqawi  
Abu Ibrahim Al-Masri  
Dar Al Maal Al Islami Trust  
DMI Administrative Services, S.A.  
Islamic Assembly of North America  
Salman Al-Ouda  
Safar Al-Hawali  
Saleh Al-Hussayen  
Sami Omar Al-Hussayen  
Muhammed J. Fakihi

RIDER  
Case 1:03-md-01570-GBD-FM Document 1208 Filed 09/08/05 Page 35 of 44  
Federal Insurance Company et al., v al Qaida et al.  
03 cv 6978 (RCC)

Queen City Cigarettes and Candy  
Agus Budiman  
Al-Baraka Bankcorp, Inc.  
Ahmed Ressam  
Zakariya Essabar

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COZEN O'CONNOR  
Attorneys for Plaintiffs  
Michael J. Sommi, Esq. (MS-7910)  
45 Broadway, 16<sup>th</sup> Floor  
New York, New York 10006  
(212) 509-9400



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACK  
ON SEPTEMBER 11, 2001

CIVIL ACTION NO.: 03 MD 1570

FEDERAL INSURANCE COMPANY; :  
PACIFIC INDEMNITY COMPANY; :  
CHUBB CUSTOM INSURANCE :  
COMPANY; CHUBB INDEMNITY :  
INSURANCE COMPANY; CHUBB :  
INSURANCE COMPANY OF CANADA; :  
CHUBB INSURANCE COMPANY OF :  
NEW JERSEY; GREAT NORTHERN :  
INSURANCE COMPANY; VIGILANT :  
INSURANCE COMPANY; ZURICH :  
AMERICAN INSURANCE COMPANY; :  
AMERICAN GUARANTEE AND :  
LIABILITY INSURANCE COMPANY; :  
AMERICAN ZURICH INSURANCE :  
COMPANY; ASSURANCE COMPANY :  
OF AMERICA; COLONIAL AMERICAN :  
CASUALTY AND SURETY :  
INSURANCE COMPANY; FIDELITY :  
AND DEPOSIT COMPANY OF :  
MARYLAND; MARYLAND :  
CASUALTY COMPANY; NORTHERN :  
INSURANCE COMPANY OF NEW :  
YORK; STEADFAST INSURANCE :  
COMPANY; VALIANT INSURANCE :  
COMPANY; ONE BEACON :  
INSURANCE COMPANY; ONE :  
BEACON AMERICA INSURANCE :  
COMPANY; AMERICAN EMPLOYERS' :  
INSURANCE COMPANY; THE :

CIVIL ACTION NO.: 03 CV 6978

FIRST AMENDED  
COMPLAINT

JURY TRIAL DEMANDED

## **NOTICE OF SUIT**

1. **Title of Legal Proceeding:** *Federal Insurance Company, et al v. Al-Qaida, et al*; United States District Court for the Southern District of New York, Civil Action No. 03 CV 6978
2. **Name of Foreign State Concerned:** The Islamic Republic of Iran
3. **Identities of Other Parties:** A list of all parties is attached hereto as Exhibit 1.
4. **Nature of Documents Served:** Summons and Complaint
5. **Nature and Purpose of Proceedings:** Action to recover for property damage, business interruption losses, personal injuries, wrongful deaths and other injuries resulting from the terrorist attack upon the United States of September 11, 2001 (the September 11<sup>th</sup> Attack). The Islamic Republic of Iran has been sued based on its participation in a conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies, of which the September 11<sup>th</sup> Attack was a direct, intended and foreseeable product. The conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies, included the aiding and abetting of, and provision of material support and resources to, al Qaida and/or affiliated foreign states, foreign terrorist organizations, commercial entities, persons and other parties.
6. **Date of Default:** N/A
7. **A response to a "Summons" and "Complaint" is required to be submitted to the court, not later than 60 days after these documents are received. The response may present jurisdictional defenses (including defenses relating to state immunity).**
8. **The failure to submit a timely response with the court can result in a Default Judgment and a request for execution to satisfy the judgment. If a default judgment has been entered, a procedure may be available to vacate or open that judgment.**

9. Questions relating to state immunities and to the jurisdiction of United States courts over foreign states are governed by the Foreign Sovereign Immunities Act of 1976, which appears in sections 1330, 1391(f), 1441(d), and 1602 through 1611, of Title 28, United States Code (Pub. L. 94-583; 90 Stat. 2891). A copy of the Foreign Sovereign Immunities Act is attached hereto.

COZEN O'CONNOR

By: \_\_\_\_\_  
MICHAEL J. SOMMI, ESQ. (MJS-7910)  
45 Broadway Atrium, Suite 1600  
New York, NY 10006  
(212) 908-1244  
(866) 591-9129 (*direct fax*)  
Attorneys for Plaintiffs

Dated: \_\_\_\_\_

OF COUNSEL:

STEPHEN A. COZEN, ESQUIRE  
ELLIOTT R. FELDMAN, ESQUIRE  
SEAN P. CARTER, ESQUIRE  
JOHN M. POPILOCK, ESQUIRE  
J. SCOTT TARBUTTON, ESQUIRE  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103  
(215) 665-2000

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## CERTIFICATE OF AUTHENTICITY

This is to certify that the enclosed documents, in the case of *Federal Insurance Co., et al. v. Al Qaida, et al.*, 03-CV-6978 (S.D.N.Y.); *In Re Terrorist Attack On September 11, 2001*, 03-MD-1570 (S.D.N.Y.):

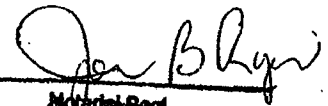
- Summons served upon the Syrian Arab Republic;
- Notice of Suit to the Syrian Arab Republic;
- Listing of all parties to the lawsuit in *Federal Insurance Co., et al. v. Al Qaida, et al.*, 03-CV-6978 (S.D.N.Y.);
- A copy of the Foreign Sovereign Immunities Act;
- First Amended Complaint brought in the United States District Court for the Southern District of New York;

have been translated from English into Arabic by members of Language Services Associates and is, to the best of our knowledge, ability and belief, a true and accurate translation.

5-17-04  
Date

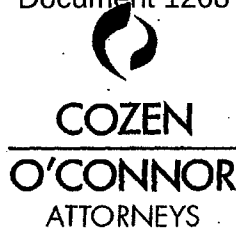
  
Florencia Agote  
Translation Project Manager

Sworn to and subscribed before me  
this 17 day of May, 2004

  
Notarial Seal  
Joan B. Ryan, Notary Public  
Philadelphia, Philadelphia County  
My Commission Expires Nov. 8, 2004  
Member, Pennsylvania Association of Notaries



PHILADELPHIA  
ATLANTA  
CHARLOTTE  
CHERRY HILL  
CHICAGO  
DALLAS  
DENVER  
LAS VEGAS  
LONDON  
LOS ANGELES



NEW YORK  
NEWARK  
SAN DIEGO  
SAN FRANCISCO  
SEATTLE  
TRENTON  
WASHINGTON, DC  
WEST CONSHOHOCKEN  
WICHITA  
WILMINGTON

A PROFESSIONAL CORPORATION

1900 MARKET STREET PHILADELPHIA, PA 19103-3508 215.665.2000 800.523.2900 215.665.2013 FAX www.cozen.com

May 20, 2004

**J. Scott Tarbutton**  
Direct Phone 215.665.7255  
Direct Fax 215.701.2467  
starbutton@cozen.com

J. Michael McMahon  
Clerk of the Court  
United States District Court for the  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Federal Insurance Co., et al v. Al Qaida, et al***  
**United States District Court for the Southern District for New York,**  
**Docket No. 03-CV-6978**

Dear Mr. McMahon:

We represent the Plaintiffs in the above referenced September 11 lawsuit in which the Syrian Arab Republic has been named as a defendant. I am writing to request your assistance in effectuating service of process on Syria under the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. § 1608(a)(3).

Enclosed are three copies of the following documents, in both English and Arabic, the official language of Syria:

***Federal Insurance Co. et al v. Al Qaida, et al***  
**United States District Court for the Southern District of New York,**  
**Docket No. 03-CV-6978**

- Summons
- Notice of Suit (including copy of the FSIA and list of parties in the lawsuit)
- Complaint

Also enclosed are three copies of the notarized Certificate of Authenticity from the translator stating that the translations are complete and accurate in *Federal Insurance Co.* In addition, I am enclosing an addressed mailing envelop for your use in transmitting the *Federal Insurance Co.* materials to Syrian Ministry of Foreign Affairs as follows:

J. Michael McMahon  
Clerk of the Court  
United States District Court for the  
Southern District of New York  
May 20, 2004  
Page 2

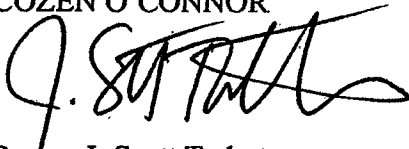
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The Syrian Arab Republic  
Ministry of Foreign Affairs  
Farouk Al-Shara  
Muhajereen Shora Avenue  
Damascus, Syria

Thank you for your assistance. If there are any questions, please do not hesitate to contact me directly.

Sincerely,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "J. Scott Tarbutton", written over the printed name.

By: J. Scott Tarbutton

JST/wlb  
Enclosures

Phila1\2071439\1

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TO  
TE Syrian Arab Republic Ministry of Foreign Affairs  
Farouk Al-Shara  
Muhajeren Shara Avenue  
Damascus, Syria

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City and Country (Localité et pays) <b>Damascus Syria</b>						
The article must be signed by: (1) the addressee; or, (2) a person authorized to sign under the regulations of the country of destination; or, (3) the postmaster at the office of destination. This signed form will be returned to the sender by the first mail.				Postmark of the Office of Destination (Signature du Bureau de destination)		
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Form 2806, February 1997 (Reverse)						

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Please do not inquire about the status of your claim for at least 3 months after you file.

Save this receipt for registered mail claims and inquiries

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
OFFICE OF THE CLERK  
500 PEARL STREET  
NEW YORK, NEW YORK 10007**

**J. MICHAEL MCMAHON  
CLERK**

May 26, 2004

**The Syrian Arab Republic  
Ministry of Foreign Affairs  
Farouk Al-Shara  
Muhajereen Shora Avenue  
Damascus, Syria**

**Federal Insurance Co., et al lv. Al Qaida, et al  
03 Cv. 6978**

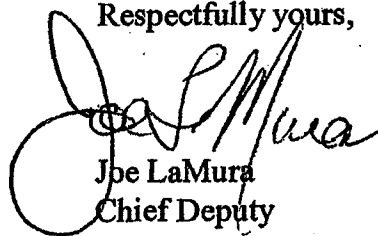
**Dear Sir:**

**Pursuant to the Foreign Sovereign Immunities Act {28U.S.C. §1608(a)(3)}, one copy of the following documents is being served on you on behalf of the Plaintiff in the above-referenced action which names your country and/or a government office as a defendant:**

**Summons  
Amended Complaint  
Notice of Suit  
Certificate of Authenticity**

**The documents are in Arabic , your country's official language.**

**Respectfully yours,**

  
**Joe LaMura  
Chief Deputy**

**Enc.**